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Ms. Rebecca Kane
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Subject: Comments on Enforcement and Compliance History Online (ECHO) Web Site

The following comments are offered on behalf of TriTAC, a technical advisory group representing publicly owned wastewater treatment agencies in California. We appreciate the opportunity to provide comments on the ECHO web site and support any effort to provide accurate and balanced information to the public.

The November 20, 2002 Federal Register notice requested comments in several areas. Our comments are organized under two of the areas mentioned in the notice.

What additional features or content should be included on the site?

Our primary comment is that the site should be revised to include information that indicates the number of compliance monitoring data points for each listed facility during the corresponding period of record (i.e., monthly, quarterly or annually). This information is needed to illustrate the level of compliance (e.g., expressed as a percentage) for each facility to place the number of compliance violations and enforcement activities in proper context. In California, most publicly owned treatment works (POTWs) are operated at a very high level of compliance (exceeding 99 percent). We believe this information is needed to round out the perception that members of the public gain from the information provided on the site.

Is the information provided on the site accurate?

At our regular meetings, we have requested local agency representatives to review the information on the ECHO site and evaluate the accuracy of the information. We have

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also requested that each agency convey specific corrections to your office through the form contained within the site.

Our review of a sampling of those responses indicates that the information on the site was inaccurate in most cases. ***Of the fifteen cases we reviewed, fourteen had inaccuracies of some type and eight had significant inaccuracies.*** We believe that this points out a need to enhance your efforts to make sure the information in the database is error free. One suggestion offered by our members is that EPA contact every facility represented on your site and to establish a regular pattern of information review and feedback to ensure that the information is accurate, and if not, that there is a transparent mechanism for corrections to be made, noted in the database, and communicated to users of the database. This last point is critical inasmuch as someone who has used inaccurate information from the database has no way of knowing when information is inaccurate and has been corrected.

One of our members also reviewed the data for indirect industrial dischargers in the database and noted some significant problems. The database lists both direct and indirect industrial dischargers. The ECHO home page states that it contains local government information, but it does not include all relevant local government information. For example, when you pull up a list of companies in a particular community, there are "no's" in the inspection column; however, the basis of this data apparently only comes from NPDES permit information for direct dischargers, and completely ignores inspection data for indirect dischargers from local POTWs pretreatment programs. The impression therefore is that these facilities are not inspected, which is not accurate.

We also believe that a clear need exists to diagnose the patterns of inaccuracy and determine how future inaccuracies can be prevented through systematic changes in (a) the quality of the data at the source, (b) the way data is derived from the primary data sources, (c) the transfer of information to the web site, and/or (d) data quality review prior to posting to the web site (e.g. a "holding tank" concept). Your efforts should result in an improving level of accuracy of displayed information over time if the integrity of the information on the web site is to be established and maintained.

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Again, we support your efforts to provide accurate information to the public and appreciate the opportunity to provide these comments.

Sincerely,

David R. Williams, Chair
Tri-TAC

DRW:akg

Cc: Chris Hornback, AMSA